## **REMARKS**

This Amendment is in response to the Final Office Action mailed August 22, 2007.

Applicant has filed a Request for Continued Examination to have the Office withdraw the finality of the Office Action and have this submission entered and considered. Claims 22, 25, 27, 32, 39, 46, and 47 have been amended. No claims have been added or cancelled.

Reconsideration in light of the amendments and remarks made herein is respectfully requested.

## Rejection Under 35 U.S.C. § 103

The Examiner rejects claims 25-47 under 35 U.S.C. § 103(a) as being unpatentable over Miller (U.S. Patent No. 6,613,100 B2) in view of IBM Technical Disclosure Bulletin ("Method for Providing a Summary for Web Page Links"), hereinafter referred to as "IBM Technical Bulletin." Applicants respectfully disagree.

Miller describes a graphical user interface that presents a current document along with thumbnail images of documents, relevant to the current document (Miller, Abstract; Column 3, line 63 to Column 4, line 35). The content of each thumbnail, or related document, is predetermined according to an "automatic content analysis procedure" (Miller, Column 5, lines 21-38). When a "user desires to access one of these documents, the user selects the appropriate thumbnail 270 via a user-input device (not shown), such as a computer mouse, trackball, etc., such selection subsequently causes the desired document to be displayed on the display pane" (Miller, Column 4, lines 35-44). The automatic content analysis procedure then automatically loads a new set of thumbnails corresponding to the newly selected document (Miller, Column 7, line 66 to Column 8, line 2).

The IBM technical bulletin describes a method for providing a summary for web page links (IBM Technical Bulletin, page 185). Two alternatives are described. A first alternative

uses a "summary tag" embedded in a web page and associated with links that are displayed in a web browser. The summary tag includes information that summarizes the contents of the associated link. Then, if a user holds down an "s" key and clicks a link, a pop-up window is displayed in the browser, to display the summary (IBM Technical Bulletin, page 186, first paragraph). The second alternative stores the summary on a web server, instead of on the web page, but is triggered when a user holds down an "s" key and clicks a link. In either case described in the IBM Technical Bulletin, a user must not only click a link to obtain a summary, but must also depress an additional keyboard key.

## Claim 25 recites:

A method, used in a computer system that includes a user input device coupled to a processor, a display and a memory, for viewing at least one of a plurality of documents, including a document selected as a current document displayed in a first display area of the display, the method comprising:

- (a) in response to a first signal from the user input device corresponding to movement of a pointer over a link within the current document displayed in the first display area, displaying in a second display area of the display a representation of content of another document associated by the link to the current document without selecting the other document as the current document and further without displaying the other document in the first display area of the display, and displaying in a third display area a representation specifying concepts of interest contained within the document;
- (b) in response to a second signal indicative of a selection of the link within the document currently being displayed from the user input device, the second signal distinguishing from the first signal, selecting the other document as the current document;
- (c) displaying the other document as the current document in the first display area of the display; and
- (d) repeatedly performing steps (a), (b), and (c), re-using the first and second display areas of the display, to present different documents in the plurality of documents to a user.

As set forth above in Claim 25, a current document is displayed in a first area and another document is displayed in a second display. The second display area displays "a representation of content of another document associated by the link to the current document without selecting the other document as the current document and further without displaying the other document in the first display area of the display, and displaying in a third display area a representation specifying concepts of interest contained within the document." Applicant respectfully submits that Miller and the IBM Technical Bulletin, taken alone or in combination, fail to describe or suggest this feature.

The Examiner stated that Miller describes "displaying in a second display area of the display a representation of content of another document in response to the movement of a pointer over a link within the current document displayed ... and displaying in a third display area a representation specifying concepts of interest contained within the document;" (Final Office Action, mailed August 22, 2007, page 10 *citing* Miller, column 6, lines 50-66 and column 7, lines 25-39). The Applicant respectfully disagrees.

In the passages cited by the Examiner, Miller states:

When the user desires to access a particular document, the user selects the appropriate thumbnail 270 via the user-input device 340. Such selection via the user-input device 340 subsequently causes the desired document to be displayed on the computer application appearing in the display panel 260 of the GUI 200.

. . .

The user then "highlights" the desired choice and the thumbnails 270 corresponding to the chosen category would be displayed (by the processor 310) on that selection panel 220-250 of the GUI 200.

Turning now to FIG. 4, a flowchart is shown depicting a process used by the apparatus 300. Commencing at step 400, the user launches a particular computer application and retrieves a desired document. The processor 310 retrieves the desired document from the document source 330 and displays, at step 410, the

document on the display panel 260 of the GUI 200. At step 420, the processor 310 further searches the document source 330 for documents that correspond to (or are relevant to) a particular category that is assigned to one of the selection panels 220-250 of the GUI 200.

Thus, Miller describes receiving a user's selection of a document, and obtaining documents that correspond to a chosen category, or documents which correspond to a particular display panel. In each of the situations described by Miller, a user must highlight/select a document, and then documents from the same category are displayed in a corresponding display panel of a GUI.

The Applicants, however, claim that in response to a cursors movement over a link within a current document, a representation of another document is displayed, where the representation includes the highlighting of concepts that are of interest to a user and present within the current document. Miller only describes displaying documents from a specific pre-defined category, and not concepts within a current document that are of interest to a user. By way of example, the display of various concepts, the strength of those concepts relative to one another, etc. are not related to document categorization (*See e.g.*, Specification, paragraph [0036]; Figures 5 and 7A-7D). In fact, the categorization of a document may be wholly unrelated to the concepts in the document. Therefore, Miller fails to teach or suggest "displaying in a second display area of the display a representation of content of another document in response to the movement of a pointer over a link within the current document displayed ...and displaying in a third display area a representation specifying concepts of interest contained within the document;."

The IBM Technical Bulletin describes providing a summary for content associated with a web page link, by accessing a "summary tag." The tag is accessed when a user both depresses an "s" key and clicks on the link. The summary tags, which are described as a pre-defined and/or pre-written summaries, however fails to provide any discussion as to highlighting concepts that

are of interest within a document. For example, the summary tags fail to teach or even suggest indicating the strength of particular subjects in a document (*See e.g.*, Specification, paragraph [0036]). Thus, the IBM Technical Bulletin also fails to teach or suggest the display of "a representation of content of another document ...and displaying in a third display area a representation specifying concepts of interest contained within the document."

Therefore, neither Miller nor the IBM Technical Bulletin teach or suggest each and every limitation claimed by the Applicants.

Accordingly, Applicant respectfully submits that the rejection of claim 25 under 35 U.S.C. § 103 has been overcome by the remarks. Since independent claims 32, 39, 46, and 47 contain similar features and limitations to those discussed above, claims 32, 39, 46, and 47 are also not rendered obvious by Miller in view of the IBM Technical Bulletin under 35 U.S.C. § 103 for similar reasons. The Applicant respectfully requests withdrawal of the rejection.

Further, dependent claims 26-31, 33-38, and 40-45 depend from claims 25, 32, and 39, and include additional features and limitations. Since claims 25, 32, and 39 were not rendered obvious by Miller in view of the IBM Technical Bulletin under 35 U.S.C. § 103, Miller and the IBM Technical Bulletin, alone or in combination, also fails to render obvious claims 26-31, 33-38, and 40-45. The Applicant respectfully requests withdrawal of the rejections.

With respect to claim 27, the present Application claims that the representation is a thumbnail image of the document and the "thumb nail image further includes highlighting of concepts of interest, and displaying an indication of a strength of the highlighted concept, to the user contained within the document." Applicant respectfully submits that this is not shown in Miller and the IBM Technical Bulletin. As discussed above, the IBM Technical Bulletin and Miller fail to teach or suggest highlighting concepts of interest to a user within a document. For

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sake of argument, even if the categories described by Miller could be interpreted to be the concepts claimed by Applicants, the idea of concept strength is wholly absent from Miller. In view of this, Applicant respectfully submits that the present invention as claimed in claim 27 is not rendered obvious by Miller in view of the IBM Technical Bulletin.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 25-47 under 35 U.S.C. § 103(a) as being unpatentable over Miller in view of the IBM Technical Bulletin.

The Examiner rejects claims 25-47 under 35 U.S.C. § 103(a) as being unpatentable over Miller (U.S. Patent No. 6,613,100 B2) in view of Kopetzky ("Visual Preview for Link Traversal on the World Wide Web"), hereinafter referred to as "Kopetzky." Applicant respectfully disagrees.

As discussed above, Miller describes a graphical user interface that presents a current document along with thumbnail images of documents, relevant to the current document according to an "automatic content analysis procedure." User selection of a thumbnail causes a desired document to be displayed, or documents within a pre-defined category to be displayed.

Kopetzky describes a method and system for providing a user with a visual preview for link traversal on a web page (Kopetzky, pages 2-5). When a mouse pointer moves over a link on a web page, a preview image is generated (Kopetzky, page 5). The preview image is generated in the form of a thumbnail sized image below the link and displayed in the web page (Kopetzky, page 5; Figure 5).

Claim 25, as discussed above, recites in part "displaying in a second display area of the display a representation of content of another document in response to the movement of a pointer

over a link within the current document displayed ...and displaying in a third display area a representation specifying concepts of interest contained within the document."

The Examiner stated that Miller fails to describe "displaying in a second display area of the display a representation of content of another document in response to the movement of a pointer over a link within the current document displayed" (Office Action, mailed April 5, 2007, page 10). As discussed above, however, Miller at best describes displaying documents that are defined as belonging to the same category, but not highlighting concepts that are relevant and within a current document.

Furthermore, Kopetzky describes the generation of a thumbnail image preview when a mouse curser moves over a link in a web page. The thumbnail image preview is described as a pre-written summary of a web page (Kopetzky, Figure 5; page 5), and wholly fails to teach or suggest the highlighting of concepts in a document. Thus, the thumbnail image preview also fails to teach or suggest "displaying in a second display area of the display a representation of content of another document in response to the movement of a pointer over a link within the current document displayed ... and displaying in a third display area a representation specifying concepts of interest contained within the document." Therefore, neither Miller nor Kopetzky teach or suggest each and every limitation claimed by the Applicants.

Accordingly, Applicant respectfully submits that the rejection of claim 25 under 35 U.S.C. § 103 has been overcome by the remarks. Since independent claims 32, 39, 46, and 47 contain similar features and limitations to those discussed above, claims 32, 39, 46, and 47 are also not rendered obvious by Miller in view of the Kopetzky under 35 U.S.C. § 103 for similar reasons. The Applicant respectfully requests withdrawal of the rejection.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 25-47 under 35 U.S.C. § 103(a) as being unpatentable over Miller in view of Kopetzky.

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## Conclusion

Applicant reserves all rights with respect to the applicability of the doctrine of equivalents. Applicant respectfully requests that a timely Notice of Allowance be issued in this case. If there are any additional charges, please charge Deposit Account No. 02-2666 for any fee deficiency that may be due.

Respectfully submitted,

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